

EAG:LAB
F. #2022R00029

****FILED****

4:43 pm, May 03, 2022

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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U.S. DISTRICT COURT

EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

INDICTMENT

- against -

TARICK BRUNSON,
Defendant.

Cr. No. **1:22-cr-00205 (EK)(MMH)**

(T. 18, U.S.C., §§ 371, 981(a)(1)(C),
1708, 2 and 3551 *et seq.*; T. 21 U.S.C.,
§ 853(p); T. 28, U.S.C., § 2461(c))

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THE GRAND JURY CHARGES:

COUNT ONE
(Conspiracy to Commit Postal Theft)

1. On or about December 21, 2021, within the Eastern District of New York and elsewhere, the defendant TARICK BRUNSON, together with others, did knowingly and willfully conspire to steal, take and abstract from United States mail routes and other authorized depositories for mail matter one or more letters, packages, bags and mail, and to remove from such letters, packages, bags and mail one or more articles and things contained therein, contrary to Title 18, United States Code, Section 1708.

2. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York and elsewhere, the defendant TARICK BRUNSON, together with others, did commit and cause the commission of, among others, the following:

OVERT ACTS

(a) On or about December 21, 2021, BRUNSON drove Co-Conspirator 1 and Co-Conspirator 2 to a United States Postal Service mail relay box in the vicinity of 565 Prospect Place in Brooklyn, New York 11238 (the “Subject Area”).

(b) On or about December 21, 2021, Co-Conspirator 1 and Co-Conspirator 2 retrieved one or more mail bags from a USPS relay box in the Subject Area.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

COUNT TWO
(Postal Theft)

3. On or about December 21, 2021, within the Eastern District of New York and elsewhere, the defendant TARICK BRUNSON, together with others, did knowingly and intentionally steal, take and abstract from and out of a letter box, mail receptacle, mail route and other depository for mail matter one or more letters, postal cards, packages, bags and mail, and unlawfully have in his possession one or more letters, postal cards, packages, bags and mail, and one or more articles and things contained therein, which had been so stolen, taken and abstracted, knowing the same to have been stolen, taken and abstracted.

(Title 18, United States Code, Sections 1708, 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

4. The United States hereby gives notice to the defendant that, upon his conviction of the either of the offenses charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(l)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offenses to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offenses.

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be

divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(l)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL

Stella Alcide

FOREPERSON


BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F.#: 2022R00029
FORM DBD-34
JUN. 85

No.

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

TARICK BRUNSON,

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 371, 981(a)(1)(C), 1708 and 3551 *et seq.*; T. 21 U.S.C.,
§ 853(p); T. 28 U.S.C., § 2461(c))

A true bill.

Stella Alcide

Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 ____

Clerk

Bail, \$ _____

Lauren A. Bowman, Assistant U.S. Attorney (718) 254-6047